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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NACARDRICK BASS,

Defendant.

Case No. 2:22-cr-00011-GMN-EJY

**STIPULATION AND JOINT MOTION  
FOR PROTECTIVE ORDER**

The government and defendant Nacardrick Bass respectfully move this Court for a protective order to limit disclosure of sensitive material pertaining to an expected trial witness of the government, including, but not limited to, documents and discovery related to said witness' discussions with law enforcement related to the defendant (hereinafter referred to as the "Protected Information").

The government intends to disclose to defense counsel documents and discovery in accordance with its discovery obligations, including pursuant to *Brady* and *Giglio*. The parties hereby stipulate and agree to the following:

- a. The Protected Information shall only be used by the defendant, his counsel, and any other members of the defendant's trial team for purposes of the defense of Nacardrick Bass in the above-captioned case;
- b. The Protected Information shall not be used for any purpose other than in the defense of Nacardrick Bass in the above-captioned case;
- c. Upon conclusion of this action, within a reasonable time not to exceed thirty days after the last appeal is final, the Protected Information shall be returned to the government or destroyed by defense counsel;
- d. Following the entry of a Protective Order, the government will disclose to defense counsel a copy of this sensitive material pursuant to the terms of the protective order;
- e. By disclosing this material, the government does not concede that any obligation of disclosure, Constitutional or otherwise, exists, nor does it concede that this material may be used for any purpose whatsoever at trial, including impeachment; and
- f. The parties reserve the right to file a motion *in limine* to preclude the defense's use of this material for any purpose whatsoever at trial.

Dated this 3rd day of March, 2022.

Respectfully submitted,

Jean N. Ripley  
JEAN N. RIPLEY  
Assistant United States Attorney

Aden Kebede  
ADEN KEBEDE  
Assistant Federal Public Defender

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 NACARDRICK BASS,

7 Defendant.  
8

Case No. 2:22-cr-00011-GMN-EJY

**PROTECTIVE ORDER**

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10 Based on the Stipulation and Joint Motion for Protective Order, and good cause ap-  
11 pearing therefore, the Court hereby:

- 12 1. Grants a protective order to limit disclosure of sensitive material, including,  
13 but not limited to, documents and discovery related to an expected trial wit-  
14 ness of the government (the “Protected Information”);
- 15 2. The Protected Information shall only be used by the defendant, his counsel,  
16 and any other members of the defendant’s trial team for purposes of the de-  
17 fense of Nacardrick Bass in the above-captioned case;
- 18 3. The Protected Information shall not be used for any purpose other than in  
19 the defense of Narcardrick Bass in the above-captioned case;
- 20 4. Following the entry of a Protective Order, the government will disclose to  
21 defense counsel a copy of this sensitive material pursuant to the terms of the  
22 protective order; and  
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Based on the foregoing, IT IS THEREFORE ORDERED that the Joint Motion for a Protective Order is hereby GRANTED.

  
HONORABLE ELAYNA J. YOUCHAK  
UNITED STATES MAGISTRATE JUDGE